

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ADREA, LLC,

Plaintiff,

v.

BARNES & NOBLE, INC.,
BARNESANDNOBLE.COM LLC, and
NOOK MEDIA LLC,

Defendants.

Civil Action No. 13-cv-4137 (JSR)

**DECLARATION OF COLIN CABRAL IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE THE
TESTIMONY OF PLAINTIFF'S DAMAGES EXPERT AND MOTIONS *IN LIMINE*
TO EXCLUDE PREJUDICIAL TESTIMONY AND EVIDENCE**

I, Colin Cabral, declare as follows:

1. I am an attorney at Proskauer Rose LLP, counsel for Plaintiff ADREA, LLC. I submit this declaration to place before the Court documents in support of Plaintiff's Opposition to the Defendants' Motion to Exclude Testimony and Motions *In Limine*.
2. Exhibit F is a true and correct copy of excerpts from the transcript of the Deposition of Ned S. Barnes on May 12, 2016 [FILED UNDER SEAL];
3. Exhibit G is a true and correct copy of the Expert Report of David Yurkerwich, dated April 8, 2016 [FILED UNDER SEAL]; and
4. Exhibit H is a true and correct copy of excerpts from the transcript of the Deposition of David Yurkerwich on May 10, 2016 [FILED UNDER SEAL].

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 16, 2016.

/s/ Colin Cabral
Colin Cabral

CERTIFICATE OF SERVICE

I certify that on June 16, 2016, I caused a copy of the foregoing document to be served upon counsel of record for Barnes & Noble, Inc., barnesandnoble.com llc, and Nook Media LLC by electronic mail.

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/s/ Colin Cabral